



Christopher Stitt

11/15/02 03:45 PM

To: Robert Nunes/R2/USEPA/US, nunes.robert@epa.gov

cc: charles_merckel@fws.gov

Subject: Re: Methylmercury/Total Mercury at Onondaga Lake - Lake Bottom



Bob -

I realize that Mike's discussion and comments are directed at the HHRA and defer to his expertise in this area. However, in terms of anything that might reflect on the BERA and/or use in ecological risk assessment, use of assumptions such as 100% of detected mercury exists as methylmercury is completely indefensible. (I'm not sure that it is even physically possible in the environment for such a condition to exist.) Additionally, I would have trouble in the BERA of choosing an arbitrary safety factor (one order of magnitude) to apply to a parameter that is already supported by site-specific studies (granted not a statistically sound quantity), is supported by literature from the scientific community, and has already been discussed by the scientific/management team and accepted with acknowledgement of the inherent uncertainties. I want to go over this more with some other people and then again with you, if so required. Keep me informed.

- Chris